

1 JULIAN HAMMOND (SBN 268489)  
jhammond@hammondlawpc.com  
2 ADRIAN BARNES (SBN 253131)  
abarnes@hammondlawpc.com  
3 POLINA BRANDLER (SBN 269086)  
pblandler@hammondlawpc.com  
4 ARI CHERNIAK (SBN 290071)  
acherniak@hammondlawpc.com  
5 HAMMONDLAW, P.C.  
1201 Pacific Ave, 6th Floor  
6 Tacoma, WA 98402  
(310) 601-6766 (Office)  
7 (310) 295-2385 (Fax)

8 *Attorneys for Plaintiff and the Putative Class*

9  
10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12

13 **JONATHAN HOANG TO**, individually and on  
14 behalf of all others similarly situated,

15 Plaintiff,  
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17 v.

18 **DIRECTTOU, LLC**, a Delaware Limited  
Liability Company

19 Defendant.  
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Case No 3:24-CV-06447-WHO

**JOINT STIPULATION TO FILE  
SECOND AMENDED COMPLAINT**

1 TO THE HONORABLE COURT: Plaintiff JONATHAN HOANG TO (“Plaintiff”) and  
2 Defendant DIRECTTOU, LLC (“Defendant,” and together with Plaintiff, “the Parties”), by and  
3 through their respective undersigned attorneys of record, stipulate as follows:

4 1. As previously reported to the Court, the parties have reached a settlement which  
5 disposes of this matter in its entirety, subject to preliminary approval. Dkt. 16. On October 29, 2024,  
6 the parties filed a Joint Stipulation to Remand this matter to state court which the Court has not yet  
7 granted. Dkt. 18.

8 2. Plaintiff has asked that Defendant consent, pursuant to Federal Rule of Civil  
9 Procedure 15(a)(2), to Plaintiff filing a Second Amended Complaint, attached hereto as **Exhibit 1**,  
10 and Defendant has consented.

11 3. This Stipulation is without prejudice to Defendant’s right to challenge, and assert all  
12 defenses it has to, the Second Amended Complaint and otherwise to defend itself against this lawsuit.

13 IT IS SO STIPULATED.

14 Dated: November 1, 2024

15 **BAKER & HOSTETLER LLP**

16  
17 By: /s/ Teresa Chow  
18 Teresa C. Chow

19 *Attorneys for Defendant*  
20 DIRECTTOU, LLC

21 **HAMMONDLAW, P.C.**

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23 By: /s/ Julian Hammond  
24 Julian Hammond

25 *Attorneys for Plaintiff*  
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**ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I, Julian Hammond, hereby certify that I have obtained the concurrence in the filing of the foregoing Stipulation from all other signatories listed above.